

In reference to the proposed plan to expand the phone band, the small increase in phone privileges will not adequately alleviate the current crowded conditions on 75 meters . There would only be a net increase of 25 kHz of spectrum for phone operation while the large **UNDERUSED** CW portion of the band would be mostly unchanged.

With the recent lessening of emphasis AND requirements regarding CW operation and with the above statement (fact) that the CW portion of the band goes virtually unused, with the exception of an occasional contest, I believe that if it is absolutely necessary to continue to have sub-bands at all, that the phone portion be increased in size and extended down to the area of 3600 KHz.

I am an Extra class licensee and I attained that grade in 1976 when the requirement was still 20 wpm. I still use CW and I enjoy the mode, but I believe that 100 khz is more than enough, especially given today's state of the art filtering on the modern commercial transceivers. I normally use older classic gear and even I would have no problem whatsoever sharing 100 kHz of CW/Digital mode spectrum space with the small number of operators that are found there.

Again, I strongly suggest that any expansion of the Phone portion of the band be done with the intent to actually give enough room to the majority of users – and they are on phone. And, as I previously stated, to accomplish this would require the reduction of the CW sub-band. That reduction would NOT create any hardship on CW and digital mode users, as anyone who regularly monitors those frequencies can attest. They are **GROSSLY UNDERUSED** and represent a huge waste in spectrum.